

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

CYNTHIA ANN REDUS-TARCHIS,
FREDRIC and BONNIE OLIVER, and
VICTOR and LINDA MILLER,

Plaintiffs,

v.

NEW YORK LIFE INVESTMENT
MANAGEMENT, LLC,

Defendant.

Civil Action No. 2:14-cv-07991-WHW-CLW

Filed Electronically

JOINT STIPULATION AND [PROPOSED] ORDER

WHEREAS, on December 23, 2014, Plaintiffs filed a Complaint (the “Complaint”) against Defendant New York Life Investment Management, LLC (“Defendant”) asserting claims on behalf of and for the benefit of three mutual funds pursuant to Section 36(b) of the Investment Company Act of 1940, 15 U.S.C. § 80a-35(b);

WHEREAS the Summons and Complaint were served upon Defendant on January 2, 2015;

WHEREAS Defendant’s time to answer, move, or otherwise respond to the Complaint will expire on January 23, 2015;

WHEREAS Defendant has proposed, and Plaintiffs have agreed, to extend Defendant’s time to answer, move, or otherwise respond to the Complaint to and including March 24, 2015;

WHEREAS no previous extension of Defendant’s time to answer, move, or otherwise respond to the Complaint has been requested or obtained; and

WHEREAS the parties have agreed upon a briefing schedule in the event Defendant files any motion in response to the Complaint;

NOW, THEREFORE, the parties hereby STIPULATE AND AGREE by and through their undersigned counsel and subject to the Court's approval that:

1. Defendant shall have until March 24, 2015 to answer, move, or otherwise respond to the Complaint.

2. If Defendant responds to the Complaint by any motion, (a) Plaintiffs shall file an opposition to such motion no later than 60 days after the filing of such motion; and (b) Defendant shall file a reply no later than 45 days after the filing of Plaintiffs' opposition.

Dated: January 16, 2015

/s/ Robert L. Lakind
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Attorneys for Plaintiffs

SO ORDERED.

Dated: January __, 2015

Honorable Cathy L. Waldor, U.S.M.J.